

Date: 6 July 2002

To: Spectrum Policy Task Force

From: Mark S. Worstall Sr.

Subject: Spectrum Policy for Broadband Internet Access

With the ever increasing growth of wireless broadband access and the small businesses that have sprung up to provide those services to undeserved areas, as well as provide alternative and competitive service in larger markets, I respectfully request you consider the following to further facilitate that growth.

1.Part 15 rules should be changed to provide for component certification instead of system certification. This would allow businesses deploying these networks to use the best equipment for the task at hand instead of a limited amount of items, often times not suited for the intended purpose. The ability to substitute an antenna or part 15 device for another, providing that the user maintained the current, and reasonable power levels set forth in Part 15, would not only further the growth of the broadband wireless Internet access market, but would also serve to lessen the demand on the FCC's enforcement branch.

2.Additional spectrum is needed in the lower frequencies for broadband access. These frequencies should be either license free, or be readily available with a reasonable license fee similar to the way the business bands are handled today. Rules should be set for these new frequencies to provide for the maximum amount of operations within them. More power should also be provisioned to use within these frequencies to provide for non line of sight communications.

3.The FCC should resist all efforts, current and future, from those that seek to take away or reallocate frequencies that are in the ISM and UNII bands that are now being used by so many successful small businesses. The growth of the wireless Internet service industry and their further deployment into undeserved rural areas depends on it.

4.Take all comments filed concerning this subject matter with the utmost attention and serious consideration.

Thank you for providing this opportunity to submit comments to the Spectrum Policy Task Force. As Chairman Powel has said, "The government has an almost impossible task trying to keep pace with the ever increasing demand for spectrum and continuing advances in wireless technology and applications". I do not envy the task that lies ahead of you. I will trust that the Spectrum Policy Task Force will, with the helping guidance of these comments, make the correct rules and policies that will help all Americans move forward, with better and faster communications, in the 21st century.